

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

ANDREW PERRONG and STEWART  
ABRAMSON, individually and on behalf of  
all others similarly situated,

Plaintiffs,

v.

CHARLES BARATTA LLC, a New York  
limited liability company, ARKADY  
FREKHTMAN ATTORNEY AT LAW, P.C.  
d/b/a FREKHTMAN & ASSOCIATES, a  
New York professional corporation,  
FLEMING NOLEN & JEZ LLP, a Texas  
limited liability partnership, RELIABLE  
LEGAL MARKETING CONSULTING,  
LLC, a Florida limited liability company,  
KRAUSE AND KINSMAN LAW, LLC, a  
Missouri limited liability company, LERNER  
& ROWE, PC, an Arizona Professional  
Corporation, and GACOVINO, LAKE &  
ASSOCIATES, P.C., a New York  
Professional Corporation.

Defendants.

Civil Action No. 2:21-cv-00996-JS-AYS

**JOINT STATUS REPORT**

Plaintiffs, Andrew Perrong and Stewart Abramson (collectively, “Plaintiffs”), and Defendants, Charles Baratta LLC (“Baratta”), Krause and Kinsman Law LLC (“Krause”), Lerner & Rowe, PC (“Lerner”), Arkady Frekhtman Attorney at Law, PC (“Arkady”), Reliable Legal Marketing Consulting LLC (“Reliable Legal”), Gacovino, Lake & Associates, P.C. (“Gacovino”) (collectively “Defendants”) submit this Joint Status Update pursuant to the Court’s March 23, 2022, Order. On May 5, 2022, the Parties participated in a private mediation that resulted in a settlement in principle, which resolves this matter on an individual basis with respect to Plaintiff

Perrong's and Plaintiff Abramson's claims against Defendants. In light of the settlement, the Parties anticipate finalizing the terms of the settlement and filing a Notice of Voluntary Dismissal within the next thirty (30) days.

Accordingly, the Parties request that the Court continue the stay of this action pending dismissal.

Dated: May 10, 2022

/s/ Laura E. Kogan

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Dated: May 10, 2022

/s/ Anthony I. Paronich

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